

**FUCHS LUBRICANTS CO.**

October 13, 2003

U.S. Environmental Protection Agency  
Emergency Enforcement & Support Section, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
Attn: Mrs. Mila V. Bensing

RE: Request for Information Pursuant to Section 104 of CERCLA for IWI Inc. Site, Summit, Illinois

This letter provides the requested information regarding IWI Inc. in accordance with Attachments A and B to your letter dated September 9, 2003.

1. All persons consulted in answering the information requests include: Mary Brier, Carol Gunkel, Khari Watkins, Kurt Sander, Clyde Rittel, Tony Muzinic, Chris Raleigh, Chris Bigelow, Pam Watson, John Cunningham, and Neal Heybeck.
2. All documents reviewed in answering the information requests include: 2002 TRI Report, hazardous waste manifest forms, accounts payable records, and accounts receivable records.
3. I have no reason to believe anyone else can provide a more detailed or complete response.
4. Fuchs Lubricants Co. (FLC) has been assigned EPA (RCRA) Identification Number ILD981952187 and TRI Facility ID Number 60426MTLLB17050.
5. I am unaware of any persons that may have caused a release or threat of release of hazardous substances, pollutants, or contaminants at IWI Inc.
6. Persons with knowledge or information regarding generation, transportation, treatment, or disposal of hazardous substances at this facility include: Chris Bigelow, Justin Jagiella, John Cunningham, Kurt Sander, Kathy Owens, Gene Ruminski, Tom Leckrone, and Khari Watkins.
7. Yes
  - a. The types of hazardous substances at FLC include flammable liquids, environmentally hazardous substance liquids, disinfectant liquid toxics, xylene solutions, corrosive liquids, liquid hazardous substances, corrosive solids, and environmentally hazardous substance solids.
  - b. Chemical suppliers. FLC purchases its raw materials from numerous suppliers, but the majority of hazardous substances are purchased from: Troy Chemical, Dow Chemical, Chemcentral, Rutgers Organics, OMG Americas, PQ Corporation, Interstate Chemical Company, Ethox Chemical, Air Products, McIntyre Group, RheinChemie, Rhodia, Cognis Corporation, Akzo Nobel, and Hydrite Chemical Company.



- c. All raw material hazardous substances are used in the manufacturing process. A majority of flammable liquids are cleaning solvents. Used solvent is disposed of as hazardous waste.
- d. These types of hazardous materials have continuously been used since the facility began operation in 1981.
- e. These hazardous materials are all received, stored, and used on site. The waste solvent is shipped offsite to Beaver Oil Co. in Hodgkins, Illinois.
- f. The following are annual quantities of materials used based on the last twelve months of available purchasing records. These numbers are representative of past usage.
  - i. Flammable liquid: 931,911 gallons (g)
  - ii. Environmental hazardous substance, liquid: 3,804 g
  - iii. Disinfectant Liquid toxic: 2,010 g
  - iv. Xylenes solution: 144 g
  - v. Corrosive liquid: 64,357 g
  - vi. Environmental hazardous substance solid: 26,576 pounds
8. Fuchs Lubricants Co. (FLC) is confident it did not introduce any hazardous materials to the Site (see detail provided by the answer to question 12). In light of that, we respectfully decline submittal of our confidential financial information.
9. FLC is a corporation. As stated in the previous answer, (FLC) is confident it was not involved in introducing hazardous materials to the Site. As a consequence, we respectfully decline providing the corporate and financial information requested.
10. FLC is not a partnership.
11. FLC is not a trust.
12. Chris Raleigh, John Cunningham, and Pam Watson remember the sale of totes to IWI Inc. in the late 1990's. Through an acquisition, FLC obtained 325-gallon totes. This was not a standard size tote used by FLC and a decision was made not to utilize the newly acquired containers. The containers had a marking that identified the Site as the fabricator. Rather than scrapping the totes, FLC contacted IWI who agreed to repurchase the containers. Two manual invoices (copies attached) were written for this one and only time FLC transacted business with the Site.
  - a. Arrangements were made with Glenn Wellman of the Site. Invoices do not indicate the transporter(s). Persons arranging sale of the totes do not recollect transportation.
  - b. Totes were sold to the Site on September 20, 1999 and November 23, 1999.
  - c. All totes were cleaned in our tote washing room prior to transportation. The totes were empty upon transportation to IWI.
  - d. FLC owned the totes.
  - e. Forty-five (45) totes were sold to IWI Inc. on September 20, 1999 an additional seventy-six (76) totes were sold to the Site on November 23, 1999. A total of 121 totes were transported to IWI Inc.



- f. FLC is not possession of any tests, analyses, or analytical results concerning the totes.
- g. There were no waste materials or hazardous substances transported.
- h. FLC invoice #5196 in the amount of \$2,500.00 was submitted to the Site for forty-five (45) totes sold on September 20, 1999. FLC invoice #5230 in the amount of \$4,180.00 was submitted to the Site for seventy-six (76) totes sold on November 23, 1999. Payment was never received.
- i. As copies of the enclosed invoices indicate, 121 totes were ever intended and delivered to the Site.
- j. The totes were not stored or held at any intermediate site prior to delivery at IWI Inc.
- k. FLC was not informed what the Site had done to the sold totes.
- l. FLC is not aware of the final disposition of the totes sold to the Site.
- m. Each tote sold to the Site was cleaned in our tote washroom prior to transport. FLC did not transport any waste material or hazardous substance to the Site.
- n. All totes were 325-gallon carbon steel that were washed in our tote washroom prior to transport. Totes had IWI Inc. markings.
- o. FLC invoiced IWI Inc. a total of \$6,680 for 121 totes.
- p. Copies of both invoices #5196 and #5230 are enclosed.
- q. All persons with knowledge regarding the sale of the totes to the Site include: Chris Raleigh, Pam Watson, John Cunningham, and Neal Heybeck.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Ruminski", is written over a horizontal line.

Gene Ruminski  
Director of EHS  
Fuchs Lubricants Co.  
708/225-6890

# Fuchs Lubricants Co.

17050 Lathrop Avenue  
Harvey, IL 60426  
Phone: (708) 333-8900  
Fax: (708) 333-9187



## INVOICE

DATE	INVOICE #
09/20/1999	5196

### BILL TO

Itasca Division  
I.W.I. Industries  
P.O. Box 381  
Summit, IL 60501

ACCT NUMBER		TERMS	SHIP VIA	PURCHASE ORDER #
20158		Net 25		
ITEM CODE	DESCRIPTION	QTY	UNIT PRICE	AMOUNT
99999-99	325 Gallon C.S. Tanks Tanks will be purchased on an "as is" condition.	45	55.55556	2,500.00
<div>Remit Payment To: Fuchs Lubricants Co. 135 S. LaSalle Street Department 1000 Chicago, IL 60674-1000</div> <div>Wire Transfer Information: LaSalle National Bank Chicago, Illinois ABA Number 071-000-505 Account Number 22-10352</div> <div>PAYABLE IN US DOLLARS</div>				
Total			\$2,500.00	

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Harvey, IL 60426  
Phone: (708) 333-8900  
Fax: (708) 333-9187

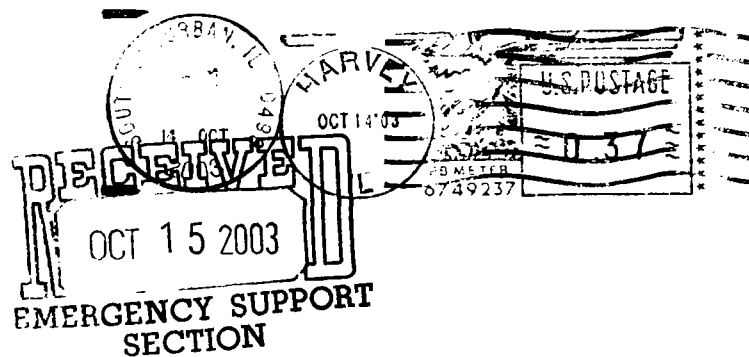
## INVOICE

DATE	INVOICE #
11/23/1999	5230

<b>BILL TO</b>
Itasco Division I.W.I. Industries P.O. Box 381 Summit, IL. 60501 Attn: Glenn Wellman

ACCT NUMBER		TERMS	SHIP VIA	PURCHASE ORDER #	
20158		Net 25			
ITEM CODE	DESCRIPTION	QTY	UNIT PRICE	AMOUNT	
00908	001-003-05-8110-00-000 Purchase of Totes on an "as is" condition	76	55.00	4,180.00	
<div>Remit Payment To: Fuchs Lubricants Co. 135 S. LaSalle Street Department 1000 Chicago, IL 60674-1000</div> <div>Wire Transfer Information: LaSalle National Bank Chicago, Illinois ABA Number 071-000-505 Account Number 22-10352</div> <div>PAYABLE IN US DOLLARS</div>					
			<div>Total\$4,180.00</div>		

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